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12/13/01 03:15 PM

To: Linda Meyer/R10/USEPA/US@EPA

cc:

Subject: Re: FMC/Astaris Proposed Closure of Pond 17 and 18a&b

FMC has previously provided detailed information to the EPA regarding potential in-situ treatment of phosphorus-containing (phossy) ponds at the Pocatello plant. The information previously submitted includes:

RIFS for the Eastern Michaud Flats Site - Feasibility Study Report - FMC Subarea, April 1997;
FMC's response to EPA and Tribal Comments on the Pond 8S closure plan, letter dated August 5, 1997 with attachments;
Summary Review of Phossy Pond Characterization and Treatment Options Evaluated, provided to EPA during the EPA-FMC meeting on November 13, 1997;
Supplemental Information Requested by EPA Regarding Treatment of Phosphorus-Containing Pond Solids at FMC, letter to EPA dated December 8, 1997 with attachments;
Pond 18 Summary Evaluation of Potential Treatment Technologies, provided to EPA and the Tribes during the EPA-Tribes-FMC meeting on March 5, 2001; and,
Additional Information on Pond 18 Evaluation of Potential Treatment Technologies, letter dated March 9, 2001 with enclosure.

Potential application of in-situ treatment technologies at the phossy ponds has been rigorously evaluated. In-situ treatment was initially considered and bench-scale testing was conducted at the site in 1994. FMC continued the evaluation of in-situ treatment technologies during the Superfund RIFS and those evaluations are described in the Feasibility Study Report - FMC Subarea, April 1997. In summary, in-situ treatment has been rejected due to worker safety concerns, potential for significant air emission releases due to intrusion into the pond solids and reactions with stabilization reagents, uncertainties regarding effectiveness/completeness of mixing, volume expansion that could overtop the pond lining system and result in releases to the environment, and cost. As you know, the in-situ stabilized waste would still have to be closed in place with a cap and post closure O&M consistent with RCRA regulations. Thus, the cost of in-situ stabilization is additive to the cost of the final RCRA cover (cap) system and post closure O&M described in the RCRA pond closure plans.

Please contact me should you have further questions regarding FMC's extensive evaluations and criteria for rejecting in-situ treatment

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